Sarai L. Thornton, Esq. (Bar No. 11067) 1 sthornton@skanemills.com 2 SKANE MILLS LLP 1120 Town Center Drive, Suite 200 3 Las Vegas, Nevada 89144 (702) 363-2535 / Fax (702) 363-2534 4 Counsel for Defendant Trans Union LLC 5 6 IN THE UNITED STATES DISTRICT COURT 7 FOR THE DISTRICT OF NEVADA 8 9 TONYA SOMERS, Case No. 2:24-cv-02001-JCM-BNW 10 Plaintiff, JOINT STIPULATION AND ORDER 11 **EXTENDING DEFENDANT TRANS** v. UNION LLC'S TIME TO FILE AN 12 ANSWER OR OTHERWISE TRANS UNION LLC, INNOVIS DATA RESPOND TO PLAINTIFF'S FIRST SOLUTIONS, INC., CLARITY SERVICES, 13 AMENDED COMPLAINT INC., CONN APPLIANCES, INC., HLS 14 OF NEVADA, LLC and FIRST BANK & (FIRST REQUEST) TRUST COMPANY, 15 Defendants. 16 17 COMES NOW Defendant Trans Union LLC ("Trans Union"), by and through its 18 19 counsel, and files this Joint Stipulation Extending Defendant Trans Union's Time to File an 20 Answer or Otherwise Respond to Plaintiff's First Amended Complaint. 21 1. Trans Union's responsive pleading is due on November 27, 2024. 22 2. Plaintiff and Trans Union are actively engaged in case-resolution negotiations, 23 including research into the allegations and fact necessary to productively discuss informal resolution. 24 25 3. Plaintiff does not oppose an extension of Trans Union's time to Answer the

Complaint so that the parties may devote their energies to resolving this matter prior to moving

forward with litigation, which was discussed and agreed upon via e-mail on November 14, 2024.

Trans Union files this Joint Stipulation consistent with its agreement with Plaintiff and

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1 respectfully requesting the Court for an extension of time to file its responsive pleading for 21 2 days, to December 11, 2024. 3 4. The Stipulation is made in good faith and not for the purposes of delay. 4 5. This is the first extension of time and the requested extension does not prejudice 5 the parties. 6 WHEREFORE, Plaintiff has agreed to extend the deadline in which Trans Union has to 7 answer or otherwise respond to Plaintiff's First Amended Complaint up to and including 8 December 11, 2024. 9 Dated this 19th day of November 2024. 10 SKANE MILLS LLP 11 /s/ Sarai L. Thornton 12 Sarai L. Thornton, Esq. (Bar No. 11067) 1120 Town Center Drive, Suite 200 13 Las Vegas, Nevada 89144 14 Telephone: (702) 363-2535 Counsel for Trans Union LLC 15 FREEDOM LAW FIRM 16 17 /s/ Gerardo Avalos Gerardo Avalos, Esq. 18 Nevada Bar No. 15171 8985 South Eastern Ave., Suite 100 19 Las Vegas, NV 89123 20 Phone: (702) 880-5554 Fax: (702) 385-5518 21 Counsel for Plaintiff Tonya Somers 22 23 IT IS SO ORDERED: 24 25 UNITED STATES MAGISTRATE JUDGE 26 27 DATED: <u>11/20/2024</u> 28

CERTIFICATE OF SERVICE I hereby certify that on this 19th day of November 2024, I filed **DEFENDANT TRANS** UNION LLC'S RULE 7.1 CERTIFICATE OF INTERESTED PARTIES with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following: George Haines Ghaines@freedomlegalteam.com Gerardo Avalos gavalos@freedomlegalteam.com Freedom Law Firm, LLC 8985 South Eastern Ave., Suite 100 Las Vegas, NV 89123 (702) 880-5554 Counsel for Plaintiff /s/ Pouneh Porooshani Pouneh Porooshani